

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANA JARVIS, *et al*,

Defendants.

§
§
§
§
§
§
§
§

Cause No. 05-CR-1849-JH

**JOINDER IN DEFENDANTS' JOINT MOTION TO SEVER
COUNTS I AND III ON GROUNDS OF MISJOINDER
AND PREJUDICIAL JOINDER, Doc. 723**

Greg Hill, by his undersigned counsel, hereby joins in the motion filed by the joint CJA defendants to sever Counts I and III on the grounds of misjoinder and prejudicial joinder on October 23, 2006, Doc. 723, and would specifically add to facts and argument presented in that motion the following:

Mr. Hill is charged in no substantive money laundering counts. To his knowledge, there is no allegation that he had any direct ties with any alleged Arizona distribution, storage, and packaging conspirators, nor that he was ever in Albuquerque, nor that he knew the vast majority of the alleged Albuquerque conspirators. Furthermore, to Mr. Hill's knowledge, there is no allegation he was a participant in any conspiracy prior to approximately 2004, the last year of this alleged conspiracy's fifteen year existence. It is highly likely that if this Court were to find multiple conspiracies, that he would not be responsible for the vast majority of conduct, statements, money transfers and quantities of drugs alleged as part of this immense alleged conspiracy.

Respectfully submitted,

electronically filed
KARI CONVERSE

2001 Carlisle Blvd. NE #E
Albuquerque, New Mexico 87110
(505) 262-8597
Fax (505) 262-1730
Counsel for Mr. Hill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joinder in Motion was served on James Braun, Assistant United States Attorney, P.O. Box 607, Albuquerque, New Mexico, 87103, on November 2, 2006.

electronically filed
KARI CONVERSE